

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

PLAINTIFF'S ASSENTED-TO MOTION TO FILE UNDER SEAL
PLAINTIFF'S MOTIONS TO COMPEL

Pursuant to Local Rule 7.2 and this matter's Stipulated Protective Order (Dkt. No. 55), Plaintiff, Students for Fair Admissions, Inc. ("SFFA"), hereby brings this assented-to motion seeking an order to file under seal two motions to compel. SFFA's first motion to compel seeks the production of specific documents in unredacted form which were previously produced by Defendant in redacted form only (the "Unredacted Documents Motion"). SFFA's second motion to compel is a renewed motion to compel which seeks the production of Defendant's application files ("Application Files Motion"). These motions, and their respective supporting documents, contain information that has been designated by Defendant as Confidential and/or Highly Confidential – Attorneys' Eyes Only pursuant to the Stipulated Protective Order. To comply with Defendant's designations, SFFA requests an order that allows these two motions, and all documents in support, to be filed under seal in their entirety. Pursuant to Local Rule 7.1(a)(2), Defendant was aware of this motion and assents to it.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow SFFA's Unredacted Documents Motion and Application Files Motion, along with all

accompanying documents in support, to be filed under seal until further order of the Court and to be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

By: /s/ Benjamin C. Caldwell

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Dated: April 7, 2017

Counsel for Plaintiff SFFA

CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a), I hereby certify that Defendant's counsel was made aware of this motion before it was filed and assents to the relief requested therein.

/s/ Benjamin C. Caldwell

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Benjamin C. Caldwell

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